U.S. BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Chapter 13 Nagena Edmond Bankruptcy Case No.: 19-11313AMC

MOTION TO EXTEND TIME FOR THE DEBTOR TO FILE HER SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO BANKRUPTCY **RULE 1007(c)**

- 1. The above-captioned Chapter 13 Bankruptcy was filed on or about March 4, 2019 as an "emergency petition."
 - 2. The Chapter 13 Bankruptcy was assigned case number 19-11313AMC.
- 3. At the time of the subject Chapter 13 Bankruptcy filing, the Debtor was facing Sheriff Sale on her property.
- Due to the urgency involved, Debtor did not have sufficient time to complete her schedules and statements.
- 5. Debtor has been making all attempts to provide all required documentation to complete the preparation of her schedules, although this has proven difficult in the time frame allotted.
- 6. Debtor intends to complete the compiling of all necessary documents as soon as possible, and review her schedules with undersigned counsel.
- 7. The current deadline to file the schedules and statement of financial affairs is March 18, 2019.
- Under Bankruptcy Rule 1007(c), the Debtor may obtain a further 8. extension of the filing deadline for "cause" shown.

Case 19-11313-amc Doc 8 Filed 03/13/19 Entered 03/13/19 14:55:04 Desc Main Document Page 2 of 2

9. Under the circumstances, specifically the Debtor experienced some difficulty with obtaining some of the documentation required for the filing, the Debtor is requesting an extension of the March 15, 2019, filing deadline for a period of not less than 2 weeks to provide all information and file the remaining schedules and statements.

WHEREFORE, the Debtor respectfully request the entry of an ORDER in the form attached, extending the time for filing the required documents.

Dated: March 13, 2019

/s/ Brad J. Sadek

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